

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

**John Thomas Keenan**

**: CHAPTER 13**

**: CASE NO.: 19-13220**

**MOTION TO WITHDRAWAL MOTION TO EXTEND PLAN  
PAYMENTS (DOCKET 39)**

NOW COMES, Jason M. Rapa, Esquire, to request that this Court enter an order withdrawing Motion to Extend Plan Payments, Docket 39. In support of this motion states:

1. The Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code on May 17, 2019.

2. Debtor due to COVID 19 Pandemic has experienced a significant decrease in income and requested an extension to plan payments.

3. On April 29, 2020 a Motion to Extend Plan Payments was filed.

5. After filing, and additional review, it was advised that due to the Debtor's plan not yet being confirmed, an Amended Chapter 13 Plan has been reflecting the request, Docketed 43.

WHEREFORE, the Counsel for the Debtors Withdraws the Motion to Extend Plan Payments and respectfully requests that this Court remove this matter from the hearing list on May 26, 2020 at 11:00 a.m.

Respectfully Submitted

/s/ Jason M. Rapa, Esquire  
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